

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CIVIL ACTION NO. 1:24-CV-00046-MOC-WCM

GERTRUDE A. SIEGEL,

Plaintiff,

v.

**TRAILS CAROLINA, LLC,
WILDERNESS TRAINING &
CONSULTING, LLC, and DERRY C.
O'KANE,**

Defendants.

**DEFENDANTS'
MOTION TO COMPEL**

NOW COME Defendants Trails Carolina, LLC, Wilderness Training & Consulting, LLC, and Derry C. O'Kane, (hereinafter "Defendants"), by and through their undersigned counsel, and move the Court to compel Plaintiff to provide complete responses to written discovery, pursuant to Federal Rule of Civil Procedure 37. In support of this Motion, Defendant submits the *Memorandum of Law in Support of Motion to Compel* filed contemporaneously herewith and incorporated herein by reference.

This the 3rd day of June, 2024.

/s/DAVID L. LEVY

David L. Levy

NC State Bar No. 34060

/s/KRISTY M. D'AMBROSIO

Kristy M. D'Ambrosio

NC State Bar No. 52817

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CERTIFICATE OF SERVICE

I certify that on June 3, 2024, a copy of the foregoing *Defendants' Motion to Compel* was served upon all counsel of Record via the CM/ECF system.

/s/DAVID L. LEVY
David L. Levy
NC State Bar No. 34060